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May 21, 2024

**VIA ECF**

Hon. Gregory H. Woods  
United States District Judge  
Southern District of New York  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl Street, Room 2260  
New York, NY 10007

**re: Request for Pre-Motion Conf./Permission to File Motion**  
**Doe v. City of New York et al**  
**EDNY Case No. 1:24-cv-03133-GHW**

Dear Hon. Judge Woods:

This office represents Plaintiff, ABC, in the above-referenced matter. Pursuant to Judge John G. Koeltl's order dated April 22, 2024, which granted Plaintiff leave to file the Complaint under a pseudonym and with necessary redactions, "without prejudice to any rulings by the Judge to whom this case is assigned." I respectfully request a pre-motion conference regarding Plaintiff's intention to file a motion to seal the entire case file.

The current order allows the Complaint to be filed under a pseudonym and with redactions. However, this measure is insufficient to fully protect Plaintiff's identity. Given the nature of the allegations and the sensitive information involved, almost all documents subsequently filed in this case, even if partially redacted, are likely to reveal Plaintiff's identity.

In light of these concerns, we seek Your Honor's permission to file a motion to seal the entire case file, including the motion itself, under seal. Alternatively, we request a pre-motion conference to discuss this matter.

Thank you for your consideration.

Respectfully submitted,

*s/ Joshua Gittleman, Esq.*